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September 30, 2020

*NYS BAR ADMISSION PENDING

VIA ECF

Honorable Robert W. Lehrburger
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Abraham Gross v. The City of New York, et al.: Civil Action No.: 20-cv 04340

Dear Judge Lehrburger:

Our firm represents Defendant Jeanne-Marie Williams. We submit this letter jointly with Kaufman Borgeest & Ryan LLP, counsel for Breaking Ground, Brenda Rosen, Teresa Palmieri, Vanessa Curcurrulo, Stephanie Labarta and Travis Fong (collectively the "Breaking Ground Defendants") and Corporation Counsel of The City of New York, counsel for all other defendants (collectively the "City Defendants").

Pursuant to the Court's September 23, 2020 Order, the parties attempted on two separate occasions to meet and confer on a Proposed Case Management Plan in connection with the referenced matter; however, the Parties were not able to reach an agreement on all items and plaintiff Abraham Gross requested the opportunity to submit his own plan. Plaintiff Netty Gross was purportedly added to this proceeding after the first conference and was not available for the second conference.

Accordingly, enclosed please find the Proposed Case Management Plan executed by counsel for Defendants. It is our understanding that, pursuant to Section II(A) of Your Honor's Individual Practices, Mr. Gross as a Pro Se Plaintiff, intends to submit his own Proposed Case Management Plan.

Very truly yours,


Jeanne-Marie Williams

cc: All Parties of Record
(via ECF)

Abraham Gross
Pro Se Plaintiff
(via e-mail)

Netty Gross
Pro Se Plaintiff
(via first class mail)